

Douglas S. Heffer (DH6082)  
FOLEY & LARDNER LLP  
90 Park Avenue  
New York, NY 10016  
Phone: (212) 682-7474  
Fax: (212) 682-2329  
email: dheffer@foley.com

-and-

Edwin D. Mason (*pro hac vice pending*)  
Joanne Lee (*pro hac vice pending*)  
FOLEY & LARDNER LLP  
321 N. Clark Street, Suite 2800  
Chicago, IL 60654  
Phone: (312) 832-4500  
Fax: (312) 832-4700  
email: jlee@foley.com

*Attorneys for Trading Technologies International, Inc.*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS, INC.,  
et al.,

Debtors.

CHAPTER 11  
Jointly Administered

Case No. 08-13555 (JMP)

**CURE OBJECTION**

Trading Technologies International, Inc. (“Trading Technologies”), by and through its undersigned counsel, submits this Cure Objection pursuant to the September 18, 2008 Order of this Court titled “*Order Under 11 U.S.C. § 105(a), 363, and 365 and Federal Rules of Bankruptcy Procedure 2002, 6004 and 6006 Authorizing and Approving (A) the Sale of Purchased Assets Free and Clear of Liens and Other Interest and (b) Assumption and Assignment of Executory Contracts and Unexpired Leases,*” and pursuant to the September 19, 2008 Order in Adversary Proceeding No. 08-1240 (JMP), captioned *Securities Investor*

*Protection Corporation v. Lehman Brothers, Inc.*, titled “*Order Approving, and Incorporating by Reference for the Purposes of this Proceeding, an Order Authorizing the Sale of Purchased Assets and Other Relief in the Lehman Brothers Holdings, Inc. Chapter 11 Proceeding.*” In further support of its Cure Objection, Trading Technologies states as follows:

1. Trading Technologies and Lehman Brothers Inc. (“Lehman” or the “Debtor”) entered into a Software License Agreement dated February 24, 2004, which allowed Lehman to license order-entry trading software from Trading Technologies on a monthly-fee subscription basis (the “License Agreement”).

2. Pursuant to the License Agreement, Trading Technologies is owed a total of \$56,355 for the months of August and September 2008.

3. The cure amount identified on Exhibit A to the List of IT Closing Date Contracts found at <http://chapter11.epiqsystems.com/lehman> (the “**Cure Amount**”) states that the amount due and owing to Trading Technologies is \$0.00. This amount is incorrect and should appropriately reflect that \$56,355 remains due and owing from the Debtor to Trading Technologies.

4. Pursuant to the Court’s directive titled “*Procedures for Resolving Cure Amounts for Closing Date Contracts,*” Trading Technologies’ account and contact information is as follows:

<b>Contract Name:</b>	Software License Agreement	
<b>Customer Name:</b>	Lehman Brothers, Inc.	
<b>Date:</b>	02/24/2004	
<b>Customer No.:</b>	LEH02	
<b>Cure Amount:</b>	August 2008	\$28,177.50
	September 2008	\$28,177.50
	-----	
	Total Cure Amount:	\$56,355.00

5. Trading Technologies will wait to be contacted by Barclays Capital, Inc. to schedule a time to meet and confer regarding this Cure Objection.

Dated: October 2, 2008  
New York, New York

/s/ Douglas S. Heffer  
Douglas S. Heffer (DH6082)  
FOLEY & LARDNER LLP  
90 Park Avenue  
New York, NY 10016  
Phone: (212) 682-7474  
Fax: (212) 682-2329  
email: dheffer@foley.com  
-and-

Edwin D. Mason (*pro hac vice pending*)  
Joanne Lee (*pro hac vice pending*)  
FOLEY & LARDNER LLP  
321 N. Clark Street, Suite 2800  
Chicago, IL 60654  
Phone: (312) 832-4500  
Fax: (312) 832-4700  
Email: jlee@foley.com

**CERTIFICATION OF SERVICE**

Katherine E. Hall, of full age, certifies as follows:

I am a Paralegal employed with the firm of Foley & Lardner LLP, Attorneys for Trading Technologies International, Inc. listed in the documents herein.

On October 2, 2008, I filed the foregoing CURE OBJECTION, electronically with the United States Bankruptcy Court for the Southern District of New York.

The following were served pursuant to the Procedures for Resolving Cure Amounts for Closing Date Contracts September 22, 2008, at the addresses set forth herein via overnight delivery:

*(Courtesy Copy)*

Hon. James M. Peck  
One Bowling Green  
New York, NY 10004-1408  
Courtroom: 601

Attorneys for Lehman Brothers Holdings,  
Inc. and LB745 LLC  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153-0119  
(Attn: Lori R. Fife and Shai Y. Waisman)

Attorneys for the Purchaser

Cleary Gottlieb Steen & Hamilton LLP, One  
Liberty Plaza, New York NY 10006  
(Attn: Lindsee P. Granfield and Lisa M.  
Schweitzer)

Attorneys for the SIPC Trustee  
Hughes Hubbard & Reed LLP  
One Battery Park Plaza New  
York, NY 10004  
(Attn: Jeffery S. Margolin)

/s/ Katherine E. Hall

Sworn to before me this  
2nd day of October, 2008

/s/ Yolanda C. Peña

Notary Public, State of Illinois